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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Wild Horse Education, a non-profit
corporation,

Plaintiffs,

v.

United States Department of Interior,
Bureau of Land Management,

Defendant.

Case No. 3:25-cv-00152-MMD-CSD

**Stipulation and Order to Extend Time
to Answer**

(First Request)

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, Plaintiff Wild Horse Education, and Federal Defendant United States Department of Interior, Bureau of Land Management, through undersigned counsel, hereby stipulate and agree as follows:

Plaintiff filed its Complaint for Declaratory and Injunctive Relief on March 18, 2025. ECF No. 1.

Plaintiff served Federal Defendant with a copy of the Summons and Complaint via U.S. certified mail on April 22, 2025.

The current deadline for Federal Defendant to respond to Plaintiff's Complaint is May 22, 2025.

On May 19, 2025, undersigned counsel for Plaintiff and Federal Defendant agreed to a 21-day extension of time for Federal Defendant to review the record and continue

1 gathering information from agency counsel. The standard for extending time is good cause.
2 *See* FRCP 6(b)(1)(A).

3 Accordingly, the parties, through undersigned counsel, submit this stipulation to a
4 21-day extension from May 22, 2025, to and including **June 12, 2025**, for Federal
5 Defendant to file an answer or otherwise respond to the Complaint. This is Federal
6 Defendant's first request for an extension of time.

7 This stipulated request is filed in good faith and not for the purposes of undue delay.

8 Respectfully submitted this 21st day of May 2025.

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Attorneys for the Federal Defendant

20 *Attorneys for the Plaintiff*

21 **IT IS SO ORDERED:**

22 **UNITED STATES MAGISTRATE JUDGE**

23 **DATED:** _____
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